IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

GEORGE KENNETH SCHOPP,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO.: 4:16-CV-00128
	§	
FORA FINANCIAL HOLDINGS, LLC,	§	
	§	
Defendant.	§	

Defendant FORA Financial Holdings, LLC's Notice of Removal

TO THE HONORABLE JUDGE OF THE COURT:

PLEASE TAKE NOTICE that on February 18, 2016, Defendant FORA Financial Holdings, LLC ("FORA") hereby submits this Notice of Removal of the above-entitled action from the Denton County Justice of the Peace Court, Precinct 3, Lewisville, Texas, to the United States District Court for the Eastern District of Texas, Sherman Division. By this petition, FORA gives notice of the removal of this action. This notice of, and petition for removal is made pursuant to 28 U.S.C. §§ 1441 *et seq.*, and is proper and appropriate based upon the following:

1. On January 28, 2016, Plaintiff George Kenneth Schopp ("Plaintiff") filed a Small Claims Citation in the Denton County Justice of the Peace Court, Precinct 3 entitled *George Kenneth Schopp v. FORA Financial Holdings, LLC*, Case No. S16-14J3.

2. The first date upon which Defendant was served a copy of the Small Claims Citation was February 5, 2016. Therefore, this Notice of Removal is timely filed with this Court within thirty (30) days after service of Plaintiff's Small Claims Citation on FORA.

3. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by FORA pursuant to the provisions of 28 U.S.C. § 1331 and 28 U.S.C. § 1441(a) in that it arises under the Telephone Consumer Protections Act, 47 U.S.C. § 227.

4. There are no other defendants named in the Small Claims Citation.

5. FORA gives notice of the removal of this action to this Court, pursuant to 28 U.S.C. § 1446 and Rule 11 of the Federal Rules of Civil Procedure, within thirty days after service and receipt by FORA of a copy of the Small Claims Citation filed in the Denton County Justice of the Peace Court, Precinct 3, Lewisville, Texas.

6. FORA appears in this action for purposes of removal but reserves all objections, arguments, and defenses to Plaintiff's Small Claims Citation. Thus, this Notice of Removal is filed subject to and with reservation of rights by FORA including, but not limited to, defenses and objections to venue, improper service of process, personal jurisdiction, and any other defenses FORA might pursue. A responsive pleading or motion will be filed in accordance with Fed. R. Civ. P. 81.

7. A copy of this Notice was filed this date with the Clerk of the Denton County Justice of the Peace Court, Precinct 3, Lewisville, Texas, and a copy of this Notice was served on this date to Plaintiff.

8. In accordance with Local Rule CV-81(c)(1), CV-81(c)(3), CV-81(c)(4), and CV-81(c)(5), a copy of the information requested in those subsections is attached hereto as Exhibit A.

9. In accordance with Local Rule CV-81(c)(2), a certified copy of the state court docket sheet is attached hereto as Exhibit B. A copy of Plaintiff's Original Petition is attached hereto as Exhibit C. A copy of the Citation is attached hereto as Exhibit D.

Respectfully submitted this 18th day of February, 2016.

s/ C. Todd Hewes
C. Todd Hewes
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Attorney for Defendant FORA Financial Holdings, LLC

CERTIFICATE OF SERVICE

I certify that a copy of Defendant's Notice of Removal was electronically filed on February 18, 2016, through the Court's CM/ECF system. Further, Defendant has provided a copy of this Notice to Plaintiff by certified mail, return receipt requested and via e-mail as follows:

George Kenneth Schopp
1404 Springaire Lane
Lewisville, Texas 75077
gkschopp@aol.com

s/ C. Todd Hewes
C. Todd Hewes